

Thomas A. Matthews, ABA No. 8511179  
Matthews & Zahare, P.C.  
431 West 7<sup>th</sup> Ave., Suite 207  
Anchorage, Alaska 99501  
Phone: (907) 276-1516  
Facsimile: (907) 276-8955  
tom.matthews@matthewszahare.com

Counsel for Plaintiff Davis

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

CHARLIE J. DAVIS, JR., )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
ZELMER HYDEN, et al., )  
 )  
Defendants. )

Case No. A02-0214 CV (JKS)

NOTICE OF TAKING DEPOSITION DUCES TECUM

TO: Marilyn J. Kamm, Esq.  
Assistant Attorney General  
State of Alaska, Dept. of Law  
Criminal Division Central Office  
P.O. Box 110300  
Juneau, AK 99811

PLEASE TAKE NOTICE that at **9:30 a.m.** on **May 22, 2006**, at the offices of Matthews & Zahare, P.C., 431 West 7<sup>th</sup> Ave., Suite 207, Anchorage, Alaska. Phone: (907) 276-1516, counsel for Plaintiff, pursuant to Fed. R. Civ. P. 26 and 30, will take the oral deposition of **Roger Hale** upon oral examination before a Notary Public or other person qualified to take oaths.

MATTHEWS & ZAHARE, P.C.  
ATTORNEYS AT LAW  
431 WEST 7TH AVENUE, SUITE 207  
ANCHORAGE, ALASKA 99501  
TEL (907) 276-1516 • FAX (907) 276-8955  
E-MAIL: mzlau@matthewszahare.com

AT STENO  
BY CONF. VAND

Pursuant to Fed. R. Civ. Pro. 30(b)(5), the witness is requested to bring with him copies of the following documents:

- Copies of all documents relating to Defendants' consideration of Plaintiff Charlie Davis' grievance and grievance appeal. This request specifically includes, but is not limited to, copies of staff meeting minutes at PCC and Medical Advisory Committee meeting minutes, notes, emails, and communications of any kind.
- Copies of all daily staff meeting minutes for Palmer Correctional Center for the period of April 22, 2002 through October 23, 2002.
- Copies of all Medical Advisory Committee meeting minutes where Charlie Davis was discussed. This includes, but is not limited to, copies of meeting minutes for the time period April 3, 2002 through December 1, 2002.
- Copies of any and all Medical Advisory Committee meeting minutes where care of inmates with heart conditions was discussed.
- Copies of all Medical Advisory Committee meeting minutes where the care of inmates with implanted defibrillators was discussed.
- Copies of all Medical Advisory Committee meeting minutes where the care of inmates taking Coumadin was discussed.

The examination will continue from day to day until completed. You are invited to attend and cross examine if you so desire.

Notice of Taking Deposition (Hale)  
Davis v. Hyden, et. al., Case No.: A02-0214 CV (JKS)  
TAM:jlw\103-2\NotDepoHale

2 of 3

Exhibit 15  
Page 2 of 3

MATTHEWS & ZAHARE, P.C.  
ATTORNEYS AT LAW  
431 WEST 7TH AVENUE, SUITE 207  
ANCHORAGE, ALASKA 99501  
TEL (907) 276-1516 • FAX (907) 276-8955  
E-MAIL: mzlav@matthewszahare.com

DATED this 17<sup>th</sup> day of May 2006, at Anchorage, Alaska.

MATTHEWS & ZAHARE, P.C.  
Counsel for Plaintiff Davis

By: 

Thomas A. Matthews  
ABA No. 8511179

CERTIFICATE OF SERVICE

I certify that on 17<sup>th</sup> May 2006 a copy of the foregoing document was served by fax and mail to:

Marilyn J. Kamm, Esq.  
Assistant Attorney General  
State of Alaska, Dept. of Law  
Criminal Division Central Office  
P.O. Box 110300  
Juneau, AK 99811

  
Joyce L. Wylie

MATTHEWS & ZAHARE, P.C.  
ATTORNEYS AT LAW  
431 WEST 7TH AVENUE, SUITE 207  
ANCHORAGE, ALASKA 99501  
TEL (907) 276-1516 • FAX (907) 276-8955  
E-MAIL: mzlaw@matthewszahare.com

Notice of Taking Deposition (Hale)  
Davis v. Hyden, et. al., Case No.: A02-0214 CV (JKS)  
TAM:jlw\103-2\NotDepoHale

3 of 3

Exhibit 15  
Page 3 of 3